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Mr. Ezra Rapport Executive Director Association of Bay Area Governments 101 Eighth Street Oakland, CA 94607-4700

Re: Response to the Sustainable Communities Strategy (SCS) Initial Vision Scenario (IVS)

Dear Mr. Rapport:

This letter transmits the Transportation Authority of Marin (TAM) Board's comments on the Initial Vision Scenario (IVS), the first iteration of land use development under the region's Sustainable Communities Strategy.

The Board acknowledges the challenge in developing the IVS and meeting the tight deadlines for identifying the SCS Preferred Scenario in early 2012. As we move towards that goal, we remain concerned that the regional agencies—ABAG, MTC, BCDC, and BAAQMD—are coordinating well to reach the SCS goals, in adoption of policies that are not in conflict. It is important that coordination occurs such that expectations to develop land use are reasonable and feasible. We recognize the IVS is an unconstrained proposal and await recognition of the limitations we face in both our natural and built infrastructure.

Community members in Marin have expressed deep frustration in the limited opportunities for public input to this accelerated process. We have received many comments about the lack of objectivity and dialog at the SCS Public Workshop on May 11. The public feels it has been left behind in this process. We are concerned that the rushed process is undermining public trust, which is necessary for a successful, publicly supported SCS Preferred Scenario.

The responsibility to implement the various proposals leading up to, and including, adoption of the SCS, lies solely with individual local governments. To that end, individual jurisdictions in Marin County have responded directly to ABAG informally or through formal correspondence from their councils. We thank ABAG staff for their work to date and encourage continued attention be given to our city's and town's concerns.

Given the reality that the SCS will be a regional blueprint for future transportation and land use, TAM organized an SCS Ad Hoc Committee to provide a forum in Marin County for consideration of the various proposals leading up to the final selection of an SCS. In the course of its work, the SCS Ad Hoc Committee, the

local planning directors, and TAM staff developed a set of principles that represent for Marin County's input to the SCS.

Presented below are the principles we request ABAG and MTC consider in subsequent development of SCS Scenarios. The TAM Board appreciates ABAG's extension of its May 20 deadline for comments on the IVS to accommodate our Board meeting schedule.

SCS AREAS OF AGREEMENT FOR MARIN COUNTY

- 1. The jurisdictions that comprise TAM understand the value of regional planning that coordinates jobs, housing, and transportation investments to affect climate change by reducing greenhouse gas emissions. We recognize the coming demographic changes to the region, particularly household formation trends and an aging population and how that will impact housing needs and the demand for housing types other than traditional low density, detached single family development. This regional coordination must involve the public in its decisions, in a meaningful fashion, that outreaches to all of our communities.
 - The environmental resources inherent to Marin have been respected in our own dedication of conservation areas. Regional agencies must continue protection of these areas, and recognize the limited resources available for development, including crucial water supply limitations and coastal lands protection.
- 2. The jobs numbers are inflated and need to be reexamined by ABAG staff. The SCS job forecast for Marin is greater than the job growth rate we have experienced between 1995 and 2010. There are virtually no vacant commercially zoned sites remaining in Marin, and there is currently a vacancy rate in excess of 20% for office space.
- 3. Regarding overall growth in jobs and housing, the current vacancy rates in Marin indicate that some time will be needed to allow economic recovery sufficient to support further growth. ABAG is encouraged to reduce expectations of housing and job growth.
- 4. The total projected households for Marin is a reasonable proportion of the growth being planned for the Bay Area.
- 5. Marin has designated 84% of the total county area as preserved open space, the home of federal, state, and local parks and recreational areas and facilities. Marin's role in providing recreational space for the Bay Area should be taken into consideration in the allocation of regional transportation funds. There is a need for funding for roads, transit, and bike/ped facilities to support these Bay Area-wide recreational attractions. Funding is critical to maintain and grow our recreational economy.
- 6. As one of the Bay Area's top agricultural counties, Marin's economic vitality is dependent on sustaining its farm-to-market economy through the provision of goods movement corridors and appropriate land use development that protects its agricultural lands. Land use/transportation planning in Marin must include recognition of and provisions for protecting our agricultural contributions to the region.
- 7. Marin has been a leader in reducing greenhouse gas emissions with effective facilities and innovative programs that support behavioral changes, such as Marin's Safe Routes to School program, the Non-Motorized Transportation Pilot Program, and a high proportion of hybrid vehicle ownership. Our unique efforts in converting driving trips to other modes should be recognized as an integral part of our efforts in reducing greenhouse gas emissions.

- 8. The desired increases in housing in already developed areas is dependent upon not only sustaining transit funding, but successfully addressing the historical needs for additional funding of transit and alternative modes of transportation. Both efficiencies in existing systems along with additional revenues must be pursued regionally to achieve climate goals along with maintaining a reasonable quality of life.
- 9. ABAG, MTC, BCDC, and BAAQMD need to coordinate their CEQA guidelines and impact thresholds to support the implementation of the SCS.
- 10. Development in Marin should be focused along the Highway 101 corridor and around SMART stations, with consideration given to air quality near the highway and planning for expected sea level rise. Communities without Highway 101 frontage or SMART stations should encourage mixed use development served by transit.
- 11. A subsequent land use/transportation plan ideally should be developed over time to refine and detail the development framework described above, with appropriate funding assigned to this planning effort. This planning should include design guidelines to assure that future development reduces vehicular trips, maximizes the use of convenient transit and retains community character. This countywide planning process must include extensive community input. There should be an opportunity at the completion of the regional SCS/RTP to revisit and revise the adopted SCS Scenario for Marin to refine the division of Marin's portion of the Bay Area's planned growth.

In closing, we look forward to reviewing and participating in the Alternative Scenarios that will be developed. We welcome further coordination that recognizes constraints—such as water supply, transit, school capacity, land-use limitations, and social equity—and that protects our inherent recreational and agricultural environment, that we have worked hard to protect here in Marin.

We appreciate the opportunity to submit our comments on the IVS and look forward to working with ABAG, MTC, and the public in leading the Bay Area into compliance with the SB 375 plan for greenhouse gas emissions reduction.

Sincerely,

Steve Kinsey TAM Board Chair

Transportation Authority of Marin

cc: Steve Heminger, Metropolitan Transportation Commission Dianne Steinhauser, Transportation Authority of Marin